REMARKS

Claims 1-3 are all the claims pending in the present application. Claim 1 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Kaminsky (UK Patent Application No. GB 2326255) in view of Scharber (US Patent No. 6,542,964).[1] Claim is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Kaminsky, in view of Scharber, and further in view of Ando (US Patent No. 6,678,715). Claim 3 is rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Kaminsky.

§103(a) Rejections (Kaminsky / Scharber) - Claim 1

The Examiner rejects claim 1 based on the reasons set forth on pages 2-3 of the present Office Action. Specifically, the Examiner alleges that Kaminsky satisfies most of the features set forth in claim 1, however the Examiner acknowledges that Kaminsky does not disclose replicating a hierarchy of classes. The Examiner, however, believes that Scharber makes up for the deficiencies of Kaminsky. Specifically, the Examiner alleges (*Response to Arguments* section):

> Scharber discloses in an analogous computer system replicating a hierarchy of classes (col. 5, lines 55-58 "a cache protocol selected...the type of the content... class of service requirements" and col .9, lines 3-9 "the content associated with that request should be replicated... to speed user response time... ICDS 50 may direct that the content be cached under HTCP or even ICP, so as to allow multiple cache servers in the hierarchy 52 to store a copy of the content. The exact protocol to use may vary with time, according to traffic conditions or other factors" also FIG. 2 and related discussion.

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[1] Claim 1 was previously only rejected over Kaminsky.

In response, Applicants submit that the cited portions of Scharber only discloses a scheme that allows for storing contents of a particular type at one or more cache servers according to a cache protocol selected according to the type of the content, a site associated with the content, server resource availability and/or class of service requirements or other business rules. Presumably, the Examiner believes the discussion of <u>class</u> of service requirements in Scharber relates to the claimed replication of the hierarchy of classes. However, on its face, basing a cache protocol on a class of service requirements, among other things, is clearly different from <u>replicating a hierarchy of classes</u>, as set forth in claim 1.

Further, when considering Scharber (first passage cited by Examiner), Applicants submit there are "classes of service requirements"; these classes in Scharber have nothing to do with "classes of belonging" : for example, there is no "inheritance relationship" between those classes.

When considering Scharber (second passage cited by Examiner), Applicants submit that a request is replicated at different cache servers, those cache servers being organized in a hierarchy 52 (see also figure 3) : there is no replication of a hierarchy of classes, there is only replication of a request (request that may have a certain class) at different elements (servers) of a hierarchy (of servers). In other words, Scharber only discusses the replication of a content of a request (content of request that have a class *having nothing to do with a class of belonging*), <u>at</u> other elements (servers), those other elements (servers) being organized in a hierarchy (a hierarchy of servers).

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Therefore, at least based on the foregoing, Applicants maintain that neither Kaminsky nor Scharber, either alone or in combination, discloses or suggest at least, "said language including instructions and enabling creation of objects from classes of belonging having hierarchical relations between them, which method includes defining in the local system classes replicating the hierarchy of classes in the remote system and including means of access to said classes in the remote system in order to enable use in the local system of instructions specific to classes defined in the remote system," as recited in claim 1.

Further, in the *Response to Arguments* section of the present Office Action (paragraph bridging pages 6 and 7), the Examiner states that the features upon which Applicant relies (i.e., search through a directory of classes) are not recited in the rejected claims. In response, Applicants submit that the arguments in this regard were simply made to refute comments that the Examiner made to support the rejection of claim 1, and these specific arguments were not intended to identify features that distinguish the claimed invention over the prior art.

§103(a) Rejections (Kaminsky / Scharber / Ando) - Claim 2

Applicants submit that claim 2 is patentable over the applied references, either alone or in combination, at least by virtue of its dependency from independent claim 1. Ando does not make up for the deficiencies of Kaminsky and Scharber.

§102(e) Rejections (Kaminsky) - Claim 3

The Examiner maintains the same rejections of claim 3 as set forth previously, and adds a few new arguments in the *Response to Arguments* section of the present Office Action (page 7). In this particular section of the Office Action, the Examiner recites some operations of the

automatic object distribution (AOD) process described in Kaminsky. However, the general

descriptions of the AOD process do not support the argument that Kaminsky satisfies the specific

feature of, "wherein the local system includes a "proxy" for each interface and said proxy is

defined to enable use in the local system of instructions specific to the interfaces defined in the

remote system," as recited in claim 3. Therefore, at least based on the foregoing, Applicants

maintain that Kaminsky does not anticipate claim 3.

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

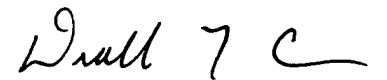overpayments to said Deposit Account.

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